

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 21-cv-10928

v.

Honorable Denise Page Hood

\$3,840,772.58 U.S. dollars constituting
125 international wire transfers seized
From U.S. correspondent bank, Citibank,
between December 21, 2020 and
January 4, 2021,

\$1,025,446.18 U.S. dollars constituting
42 international wire transfers seized
from U.S. correspondent bank, JPMorgan
Chase Bank, between December 21, 2020
and January 4, 2021,

\$765,143.73 U.S. dollars constituting
40 international wire transfers seized
from U.S. correspondent bank, Bank of
New York Mellon, between December 21,
2020 and January 4, 2021,

\$145,466.52 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Mashreq
Bank PSC, between December 21, 2020
and January 4, 2021,

\$387,337.51 U.S. dollars constituting
13 international wire transfers seized
from U.S. correspondent bank, Standard
Chartered Bank, between December 21,
2020 And January 4, 2021,

\$159,616.77 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Deutsche
Bank Trust Company Americas, between
December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting
67 wire transfers seized from U.S.
correspondent bank, Citibank, N.A.,
between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, JPMorgan Chase Bank,
between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, Bank of America,
between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting
28 wire transfers seized from U.S.
correspondent bank, Bank of New York
Mellon between May 3, 2021 and May 21,
2021,

\$20,155 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Deutsche Bank
and Trust Company Americas; between
May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Mashreq Bank PSC,
between May 3, 2021 and May 21, 2021,

Defendants,

MEMON EMPIRE FOODSTUFF TRADING, LLC

Claimant.

VERIFIED CLAIM

Claimant Memon Empire Foodstuff Trading, LLC, by and through Undersigned Counsel, hereby files this Verified Claim pursuant to 18 U.S.C. § 938(a)(4)(A) and Rules G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and hereby states the following:

1. The identities of the specific properties being claimed are the funds associated with the following wire transactions, as identified in the Second Amended Complaint for Forfeiture in the above-styled case:

Wire No.	Wire Date	Amount
129	12/21/2020	\$30,443.00
299	5/4/2021	\$5,152.00
300	5/5/2021	\$49,520.00
301	5/6/2021	\$49,880.00
302	5/10/2021	\$32,410.00
303	5/10/2021	\$6,250.00
304	5/10/2021	\$45,530.00
305	5/10/2021	\$7,040.00
306	5/10/2021	\$25,775.00
307	5/10/2021	\$45,780.00
308	5/10/2021	\$41,880.00
309	5/10/2021	\$58,880.00

2. The identity of Claimant is Memon Empire Foodstuff Trading, LLC (“Claimant Memon Empire”). Claimant Memon Empire is a foreign company established under the laws of the country of the United Arab Emirates with its primary office located at SHOP R02 EMIRATES GARDEN 1 R1 AL BARSHA SOUTH 4TH DUBAI.

3. Claimant Memon Empire has a valid and legal interest in all of the seized properties listed in Paragraph 1 of this Verified Claim as Claimant Memon Empire is the corporate owner of all of the seized properties.

4. Umer Abbas is the sole owner of Claimant Memon Empire.

5. Claimant Memon Empire acquired the properties listed in Paragraph 1 of this Verified Claim through lawful and legitimate means.

This 8 day of February, 2022

/s/Rebecca L. Castaneda
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VERIFICATION

Pursuant to 28 U.S.C. § 1746, Umer Abbas, owner of Claimant Memon Empire, hereby declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8 day of February, 2022.



Umer Abbas
Owner of Memon Empire
Foodstuff Trading, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Verified Claim has been electronically filed on February 8 2022, with the Clerk of the Court using the CM/ECF system which will automatically transmit an electronic filing to all parties of record.

/s/Rebecca L. Castaneda
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